

GLOBAL COMMUNICATIONS CORPORATION 8 February 1994  
PART TWO OF RESPONSE TO MD Docket No. 93-297

14.7 When invoices are paid by bank draft a separate notice should be sent to the coast station or authority detailing exactly which invoices are being paid. This avoids considerable confusion on the receiving end.

14.8 SUMMARY OF OUR RECOMMENDATIONS REGARDS PAYMENTS. We recommend that accounting authorities be required to do the following:

14.8.1 Require that acknowledgements be sent to other authorities and coast stations within 30 days or less for all invoices received including rejections with alternate billing information if available.

14.8.2 When paying invoices clearly state the invoices being paid and when paying by bank draft, notify the payee by the postal service of the same information.

14.8.3 Regarding maintaining a data base for vessels with unpaid balances with AAIC's we are not sure what to recommend. Possibly one AAIC could be authorized to maintain such a list and for a fee make data available to the other AAIC's both US and international.

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15 OUR SPECIFIC RECOMMENDATIONS ON REQUIREMENTS FOR  
CERTIFICATION AS AN ACCOUNTING AUTHORITY FOR INCLUSION  
IN THE NEW CFR 47 PART 3 ARE AS FOLLOWS.

15.1 Require that deposits from vessels be placed in an  
escrow account to assure sufficient or at least partial  
company reserves in the event of default by the AAIC.

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16 This concludes the response from Global Communications  
corporation. Thank you for the opportunity to comment on  
this rule making.

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17 This response has been prepared in house because we feel that in this case that our personal experiences were the most important contribution we could make to this rule making.

18 We feel that our being a coast station and also an accounting authority will provide for the Commission a unique one of a kind viewpoint that no other replies to this rule making will duplicate. Hence it is likely in our view that our recommendations will not duplicate the responses of the other replies.

Respectfully



Peter D. Church

President

Global Communications Corporation

PDC:pdg

Attached:

Copy of letter received from GR05.

Data on the GB10 unpaid account.

Copies sent to:

By Fax.:

1 Copy to The Secretary,  
Federal Communications Commission

By Federal Express:

7 copies to The Secretary,  
Federal Communications Commission

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GB10 Uncollectable account, with the shipping company playing hopscotch between accounting authorities.

For the record the vessels are the,

| Name       | Call sign | Date of traffic |
|------------|-----------|-----------------|
| AL MUJEEB  | ELDI2     | 16 July 1990    |
| GULF GRAIN | ELCM5     | 1 Sept 1990     |
| EL AALIM   | ELDI2     | 30 July 1990    |

operated by Terra Marine Shipping Management  
Old Ralli Bldg.  
2nd Floor  
Talpur Rd. off Chundrigar Rd.  
Karachi,  
Pakistan

The old address & company name,

Gulfeast Shipmanagement Ltd.  
14 th. Floor  
Belgian House  
77-79 Gloucester Road  
Wanchai,  
Hong Kong

Administrative Manager:  
Mr. Joseph Isaac

Tel: 8631144  
Fax: 8669010  
Tlx: 86204 GESL H

End.



ΕΛΛΗΝΙΚΕΣ ΡΑΔΙΟ - ΥΠΗΡΕΣΙΕΣ Ε.Π.Ε.  
HELLENIC RADIO SERVICES L.T.D.

431019  
10K  
GR 05

HIGH SEAS STATION WAH, V.I. RADIO  
GLOBAL COMMUNICATIONS CORP.  
P.O. BOX 7009, SAINT THOMAS  
U.S. VIRGIN ISLANDS 00801

59, IROON POLITECHNIΟΥ STR.  
185 35 PIRAEUS - GREECE  
TEL. 41 84 126 - 7 • 41 81 218 - 9  
FAX 42 82 883 TLX 24 1469 HRS GR

ATTN: KAREN KIVEL  
MANAGER EXTERNAL ACCOUNTS

07/10/93

Piraeus, .....

REF: 214

Dear Sirs,

regarding to your attached photocopy letter please be informed that we have received the refered account and we are hereby pleased to accept our debt which is 94,40\$.

We would like to inform you that sometimes the total expences, including bank and transportation expences make the sending of a small-amount cheque unprofitable.

Putting under your consideration our above mentioned problem, we would like you to accept the delay of the aquittance of your invoice(s).

We assure you that the full-payment will be together with your next invoice, as long as the total amount outruns the amount of 200\$.

Please let us know your comments.

In anticipation of your kind cooperation.

Yours Faithfully

HELLENIC RADIOSERVICES LTD

